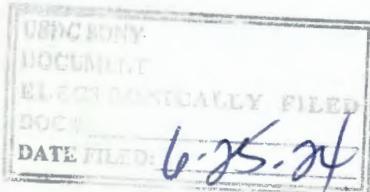


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June 24, 2024

Hon. Lewis A. Kaplan  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, NY 10007

United States v. Khalfan Khamis Mohamed  
98 Cr. 1023 (LAK)

Dear Judge Kaplan:

I write seeking to be appointed to represent Mr. Mohamed who wishes to file an application for compassionate release. I, along with David Ruhnke, represented Mr. Mohamed at his capital trial in 2001 which resulted in a sentence of life imprisonment. I direct this letter to Your Honor because Judge Sand, who presided over the trial, is no longer on the bench. A review of the docket on PACER reflects that you have most recently handled matters related to the case.

Mr. Mohamed contacted me by letter asking if I would represent him on such a motion. I informed him that, were I appointed, I would. He has served 25 years of his life sentence, the bulk of which was spent at ADX under restrictive conditions of confinement. For that, and other reasons which can be more fully discussed in a motion Mr. Mohamed believes that he has a meritorious claim for release.

If you have any questions regarding this application please contact my office.

Respectfully submitted,

*David Stern*

David Stern

*Granted. Mr. Stern is  
 appointed under the CJA  
 DR 6/25/24*